

**UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA  
PHILADELPHIA DIVISION**

IN RE:

BRENDA G MARTIN

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\* Case No. 20-13446-elf  
Chapter 13

Debtor(s).

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**OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN**

NOW COMES AmeriHome Mortgage Company, LLC (“Creditor”) by its attorneys, Daniel P. Jones and Stern & Eisenberg, PC, hereby files this Objection to the Debtor's Chapter 13 Plan filed on August 23, 2020 (the “Plan”), as follows:

1. Creditor is a secured in the above captioned case because it is the holder/servicer of a Note and Deed of Trust dated May 4, 2018 in the original principal amount of Two Hundred Twenty Thousand Nine Hundred Twenty-Four and 00/100 Dollars (\$220,924.00) bearing interest at a rate of 5.00000% per annum. The Note is secured by real property of the Debtor commonly known as 1405 Pennsylvania Ave, Croydon, PA 19021 (the “Property”).
2. Creditor filed a proof of claim in the instant case prior to the established bar date, which itemizes the debtor's total debt of \$250,712.43 and with pre-petition arrears of \$37,359.89.
3. Debtor's Plan asserts the arrears owing to Creditor in relation to the Property are only \$34,000.00 From initial review the figures on the Plan fail to adequately protect Creditor.
4. The Plan does not provide for full payment of Creditor's secured claim, thus Creditor objects to Debtor's plan as it fails to comply with the requirements of 11 U.S.C. §§ 1322(b)(3) and 1325(a)(5) and cannot be confirmed.

**WHEREFORE**, the foregoing premises considered, Creditor moves this Court to deny confirmation of the Plan and such other and further relief that the Court deems just and proper.

Date: October 26, 2020

Respectfully Submitted,

/s/ Daniel P. Jones  
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Attorney for Creditor

**CERTIFICATE OF SERVICE**

This is to certify that I have caused a copy of the foregoing Objection to Confirmation to be served electronically. Those not served electronically have been served by depositing same in the United States First Mail in a properly addressed envelope to each with adequate postage thereon as follows, on October 26, 2020:

Brenda G Martin  
1405 Pennslyvania Ave  
Croydon, PA 19021

*Debtors*

William C. Miller, Esq.  
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*Chapter13 Trustee*

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*U.S. Trustee*

Respectfully submitted,

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